

EXHIBIT B

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October 17, 2013

VIA EMAIL

John K. Dema
Law Offices of John K. Dema, P.C.
1236 Strand Street, Suite 103
Christiansted, St. Croix
U.S. Virgin Islands 00820

Re: Commonwealth of Puerto Rico, et al. v. Shell Oil Co., et al., 07-civ-10470

Dear Jack:

In your letter to Judge Scheindlin dated October 15, 2013, you claim that certain unspecified Defendants “have delayed scheduling many already noticed depositions for months.” Just so the record is clear, the CITGO Rule 30(b)(6) deposition has not gone forward because plaintiffs have failed to schedule it notwithstanding that CITGO-proffered dates have been on the table for more than two months.

Specifically, this history of CITGO’s efforts to schedule the deposition is as follows:

- 7/29/13 Letter from Lisa Meyer to Tracy O’Reilly acknowledging receipt of Rule 30(b)(6) Notice and advising of dates likely to be proposed by CITGO (September 17-20 or September 24-27)
- 8/8/13 Letter from Pam Hanebutt to John Gilmour offering September 24-27
- 9/6/13 Email from Pam Hanebutt to John Gilmour inquiring whether plaintiffs intend to proceed on the proffered September dates which CITGO has been holding since August 8
- 9/11/13 Email from John Gilmour releasing September dates
- 9/23/13 Email from Pam Hanebutt to John Gilmour offering November 12-14 as alternative dates
- 10/1/13 Email to Duane Miller regarding status of deposition scheduling efforts
- 10/3/13 Email to Nathan Short regarding status of deposition scheduling efforts

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We have been holding the proposed November deposition dates for over three weeks with no response. Please advise by the close of business on Friday whether one of those dates is acceptable or whether we can release them.

In anticipation of a deposition being scheduled eventually, enclosed are the CITGO Defendants' Objections to the Rule 30(b)(6) Notice served upon them.

We look forward to hearing from you.

Sincerely,

A handwritten signature in cursive script, appearing to read "Pam", written in black ink.

Pamela R. Hanebutt

PRH:sms

cc: All Counsel of Record via LNFS